

EXHIBIT B

Jeremy Roller

From: Matt Kezhaya <matt@crown.law>
Sent: Tuesday, August 8, 2023 9:52 AM
To: Jeremy Roller; Sonia Kezhaya
Cc: Sara Tesoriero; Cameron Stracher
Subject: RE: TST v. Newsweek -- request to accept service

Reputational harm. Your clients have the subject article as part of their "linktree." I haven't delved through all of their incessant social media postings, but presumably they have made reference to the article statement at some point.

Impeachment. Your clients have made several statements evidencing bias against TST from which a jury could infer a willingness to distort the truth.

Damages. How much money did your clients receive after the publishing of the Newsweek article? That has a tendency to show the economic value of the article and, therefore, TST's damages therefor.

I'm also curious to know what, all, conversations they have had with Julia Duin, or any other Newsweek reporters.

Falsity is but one element of a libel claim. I will inquire into the full extent of matters relevant to the subject action, as well as anything useful for impeachment.

The foregoing is intended to be illustrative, not exhaustive.

From: Jeremy Roller <jroller@aretelaw.com>
Sent: Tuesday, August 8, 2023 11:29 AM
To: Matt Kezhaya <matt@crown.law>; Sonia Kezhaya <sonia@crown.law>
Cc: Sara Tesoriero <sara@stracherlaw.com>; Cameron Stracher <cam@stracherlaw.com>
Subject: RE: TST v. Newsweek -- request to accept service

Matt,

How is anything beyond my clients' knowledge of sexual abuse and their cover-ups (if any) relevant to the subject matter of the action, given how this case was drastically narrowed given Judge Vyskocil's March order?

Jeremy

Jeremy Roller



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From: Matt Kezhaya <matt@crown.law>
Sent: Tuesday, August 8, 2023 9:08 AM
To: Jeremy Roller <jroller@aretelaw.com>; Sonia Kezhaya <sonia@crown.law>
Cc: Sara Tesoriero <sara@stracherlaw.com>; Cameron Stracher <cam@stracherlaw.com>
Subject: RE: TST v. Newsweek -- request to accept service

No, the scope of the deposition will be to the maximum extent permissible under the rules. *See* 8A *Fed. Prac. & Proc. Civ.* § 2113 (3d ed.) (“anything relevant to the subject matter of the action”); 8 *Fed. Prac. & Proc. Civ.* § 2015 (3d ed.) (matters useful for impeachment).

Re: burden, I invite you to remind your clients that they rejected a very reasonable settlement demand, dated April 15, 2021.

If you choose to file a motion, please note that TST will seek attorney’s fees for having to respond.

From: Jeremy Roller <jroller@aretelaw.com>
Sent: Tuesday, August 8, 2023 10:09 AM
To: Matt Kezhaya <matt@crown.law>; Sonia Kezhaya <sonia@crown.law>
Cc: Sara Tesoriero <sara@stracherlaw.com>; Cameron Stracher <cam@stracherlaw.com>
Subject: RE: TST v. Newsweek -- request to accept service

Matt and Sonia,

I haven’t closely followed the developments in the Newsweek case and just now came to learn of the effect the court’s order on Newsweek’s motion to dismiss has on the discovery that is at issue. As I understand the court’s order, TST’s defamation claim survives to the limited extent that a former member referenced “accounts of sexual abuse being covered up.” I do not even know if my clients know anything about that. But assuming they do, will TST agree to limit the scope of the depositions to my clients’ knowledge of sexual abuse and their cover-ups (if any)? Attending these depositions is a burden to my clients, as TST’s 3 ½ years of litigation against them has been. Even more, without agreeing to keep the scope of the deposition to this narrow topic, TST could misuse the SDNY deposition to obtain evidence it would use in any remanded or new Washington proceeding, which is plainly improper.

Please let me know, or if it would be helpful to discuss this.

Of course, my clients reserve all rights to object or otherwise respond to the deposition subpoenas, up to and including filing a motion to quash, motion for protective order, and the like.

Thank you.

Jeremy

Jeremy Roller



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From: Jeremy Roller
Sent: Sunday, August 6, 2023 9:23 AM
To: Sonia Kezhaya <sonia@crown.law>
Cc: Sara Tesoriero <sara@stracherlaw.com>; Cameron Stracher <cam@stracherlaw.com>; Matt Kezhaya <matt@crown.law>
Subject: RE: TST v. Newsweek -- request to accept service

Hi Sonia,

My clients—David Johnson, Leah Fishbaugh, Mickey Powell, and Nathan Sullivan—have authorized me to accept service of these subpoenas.

As mentioned in the thread below, I need to check with all four clients regarding the timing of the depositions.

Jeremy

Jeremy Roller



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From: Sonia Kezhaya <sonia@crow.n.law>

Sent: Thursday, August 3, 2023 10:32 AM

To: Jeremy Roller <jroller@aretelaw.com>

Cc: Sara Tesoriero <sara@stracherlaw.com>; Cameron Stracher <cam@stracherlaw.com>; Matt Kezhaya <matt@crow.n.law>

Subject: RE: TST v. Newsweek -- request to accept service

Jeremy,

Please see the attached subpoenas for your clients. Please advise by end of week if you will accept service of the subpoenas by email.

Thank you,

Sonia

From: Jeremy Roller <jroller@aretelaw.com>

Sent: Wednesday, August 2, 2023 3:30 PM

To: Matt Kezhaya <matt@crow.n.law>; Cameron Stracher <cam@stracherlaw.com>; Sonia Kezhaya <sonia@crow.n.law>

Cc: Sara Tesoriero <sara@stracherlaw.com>

Subject: RE: TST v. Newsweek -- request to accept service

Matt,

I think I will be able to accept service on behalf of my four clients in the *TST v. Johnson, et al.* matter. But before doing so I would like to see the subpoenas.

I will also need to confirm schedules with my clients. That week is open for me, but I will be out of town and unavailable the following week.

Thanks.

Jeremy

Jeremy Roller



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From: Matt Kezhaya <matt@crow.n.law>

Sent: Wednesday, August 2, 2023 1:09 PM

To: Cameron Stracher <cam@stracherlaw.com>; Sonia Kezhaya <sonia@crow.n.law>

Cc: Jeremy Roller <jroller@aretelaw.com>; Sara Tesoriero <sara@stracherlaw.com>

Subject: RE: TST v. Newsweek -- request to accept service

Yes, we will do that but we also have to issue notices of depositions to you. FRCP 30(b)(1). The notice must be served reasonably in advance of the subpoena going out so as to give y'all an opportunity to object to the deposition or put contours on it by way of motion for protective order.

Jeremy is counsel for the *Johnson* defendants and we have had separate communications which culminated in his request for the notices as a condition precedent to seeing if he will accept service for them.

Subpoenas forthcoming./

From: Cameron Stracher <cam@stracherlaw.com>

Sent: Wednesday, August 2, 2023 3:02 PM

To: Sonia Kezhaya <sonia@crow.n.law>

Cc: Jeremy Roller <jroller@aretelaw.com>; Sara Tesoriero <sara@stracherlaw.com>; Matt Kezhaya <matt@crow.n.law>

Subject: Re: TST v. Newsweek -- request to accept service

Hi Sonia — At a minimum you have to serve a Rule 45 subpoena because none of these people are parties.

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On Aug 2, 2023, at 3:22 PM, Sonia Kezhaya <sonia@crow.n.law> wrote:

Hello all,

Please see attached for notices of deposition for Leah Fishbaugh, Mickey Meeham, David Alan Johnson (AKA "ADJ"), and Nathan Sullivan.

Jeremy, please advise if you are willing to accept service on behalf of your clients.

Thank you,

Sonia

<2023 08 02 ADJ notice of deposition.pdf><2023 08 02 Meeham notice of deposition.pdf><2023 08 02 Fishbaugh notice of deposition.pdf><2023 08 02 Sullivan notice of deposition.pdf>